

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Section 63.63 Application of Comcast IP)	
Phone, LLC, Comcast Business Communications,)	File No. _____
LLC, and Comcast Phone of California, LLC)	
)	
For Authority Pursuant to Section 214 of)	
The Communications Act of 1934, As Amended,)	
To Suspend the Provision of Service)	

SECTION 63.63 APPLICATION OF COMCAST

Comcast IP Phone, LLC, Comcast Business Communications, LLC, and Comcast Phone of California, LLC, collectively referenced herein as “Comcast,” seek emergency authorization under Section 214(a) of the Communications Act, as amended (“the Act”), 47 U.S.C. § 214, and Section 63.63 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. § 63.63, to temporarily suspend certain of Comcast’s interstate services within two communities in California – Magalia and Paradise – due to the substantial destruction and damage to its facilities caused by the devastating effects of the recent wildfire in California, until these facilities can be rebuilt and services can be restored.

As required by Section 63.63(a) of the Commission’s rules, Comcast provides the following information:

- (1) Effective Date of Impairment and Service Area Affected:** Comcast’s services were suspended on or around November 8, 2018, as a wildfire known as the “Camp Fire” swept through Paradise and other parts of Butte County, California. The towns of Oroville, Paradise, Magalia, and portions of Chico were impacted by service interruptions and outages as a result of the Camp Fire. Comcast has restored service

to the portions of Oroville and Chico that were impacted. Please see the map in Attachment A, which illustrates damage caused by the Camp Fire to Paradise and Magalia.

(2) Nature and Estimated Duration of Conditions Causing the Impairment:

The Camp Fire started on November 8, 2018 at 6:29 am Pacific Time.¹ Fueled by intense north winds, a dry air mass, and critically dry fuels (*e.g.*, grass and brush), the fire moved rapidly from the Pulga area in the Feather River Canyon into nearby communities including Paradise and Magalia, causing extensive and widespread damage to infrastructure and buildings. Critical fire weather conditions spread the fire to over 100,000 acres in the first two days.² The Camp Fire was fully contained by November 25, 2018, by which point it had burned 153,336 acres and destroyed or damaged thousands of structures.³

With respect to Comcast's infrastructure, the Camp Fire destroyed, among other things, a secondary headend in Paradise. In addition, 19 nodes were damaged, as were a total of 181 plant miles, including 149 miles of aerial plant and 32 miles of underground plant.

(3) Facts Showing that Such Conditions Could Not Reasonably Have Been

Foreseen: As noted above, the suspension of service was caused by an extremely destructive wildfire, which was completely beyond Comcast's control. The cause of the Camp Fire is under investigation by the California Department of Forestry and

¹ Camp Fire, INCIWEB, <https://inciweb.nwcg.gov/incident/6250/>.

² *Id.*

³ *Id.*

Fire Protection and other governmental agencies. Please note, however, that Comcast has no facilities in the general vicinity of the origination point of the Camp Fire.

- (4) **Description of the Services Involved:** Comcast provides a variety of residential and business interstate services in this area, including voice over Internet protocol and private line services.

- (5) **Nature of Service that Will Be Available or Substituted:** As noted above, the towns of Oroville, Paradise, Magalia, and portions of Chico experienced service interruptions and outages as a result of the Camp Fire. At this time, service has been restored to the portions of Oroville and Chico that experienced an interruption. Nevertheless, portions of Magalia and Paradise continue to experience service impairment. Most notably, a large portion of these areas was destroyed by the Camp Fire. The extent to which residences and businesses in Magalia and Paradise will be rebuilt and the timeframe for such reconstruction are unknown at this time. Comcast intends to restore service to rebuilt areas and to provide these areas with the same services that were available before the wildfire. Comcast will update the Commission, as needed, if this plan changes in any material way.

- (6) **Effect Upon Rates to Any Person in the Community:** Comcast has implemented a series of emergency customer protections for customers affected by the Camp Fire. Aside from those protections, Comcast does not anticipate that this emergency suspension of service will impact the rates charged to any customers in the community.

(7) **Efforts Made and/or Planned to Restore Original Service or Establish**

Comparable Service: Comcast is restoring its facilities in the areas impacted by the

Camp Fire as efficiently and safely as possible based on the availability of infrastructure (*e.g.*, utility poles), the availability of power, and/or customer access to the area. Comcast has replaced and/or repaired (where possible) existing facilities that served structures that were salvageable and continues to work diligently to restore service in the areas affected. Moreover, Comcast deployed approximately ten times its usual staffing level assigned to the area impacted by the Camp Fire in order to accelerate its network recovery and restoration efforts. These additional personnel included Comcast employees from other regions within California, such as Santa Barbara County and the San Francisco Bay area, as well as contractors from other regions within California and other states. Comcast's command center in Chico remains in place today and will remain in place until restoration is complete.

For the reasons set forth above, Comcast respectfully requests Commission approval of this Section 63.63 Application to temporarily suspend interstate services where its facilities were destroyed or damaged in Magalia and Paradise until these facilities can be rebuilt and services can be restored.

Please direct any questions regarding this Application to the undersigned.

Respectfully submitted,

COMCAST IP PHONE, LLC,
COMCAST BUSINESS COMMUNICATIONS, LLC, AND
COMCAST PHONE OF CALIFORNIA, LLC

/s/ *Brian A. Rankin*

Brian A. Rankin
Vice President, Senior Deputy General Counsel
COMCAST CORPORATION
1701 JFK Boulevard
Philadelphia, PA 19103
E-Mail: Brian_Rankin@Comcast.com

Emily J. H. Daniels
Lawler, Metzger, Keeney & Logan, LLC
1717 K Street, NW, Suite 1075
Washington, DC 20006
Telephone: (202) 777-7723
E-Mail: edaniels@lawlermetzger.com
Counsel to Comcast

ATTACHMENT A

City of Paradise - Camp Fire 2018
Parcels with and without Damaged Structures

